

REMARKS/ARGUMENTS

In this Amendment, Applicant has amended claims 1-10 and claims 30-33 and cancelled claims 11-29 from further consideration in this application. Applicant is not conceding that the subject matter encompassed by claims 11-29, prior to this Amendment is not patentable over the art cited by the Examiner. Claims 1-10 and 30-33 were amended and claims 11-29 were cancelled in this Amendment to facilitate expeditious prosecution of the allowable subject matter. Applicant respectfully reserves the right to pursue claims, including the subject matter encompassed by claims 11-29, as presented prior to this Amendment and additional claims in one or more continuing applications.

In this amendment, only claims 1-10 and 30-33 will be discussed as the other claims have been canceled to be pursued at a later time. In paragraph 3 of the office action, claims 1, 4, 10, 31 and 33 have been rejected as being unpatentable over U.S. 6,539,421 to Appelman et al. (hereinafter Appelman) in view of U.S. 6,209,100 to Robertson et al. (hereinafter Robertson). The rejection is traversed and reconsideration is respectfully requested.

Appelman discloses a messaging application user interface which has an input element for receiving electronic messages and an output element for displaying electronic messages. The messaging application user interface can be implemented so as to maintain a subset of the plurality of potential message recipients, the subset being determined using a predetermined criterion (see abstract). As described at Col. 4, lines 35-37: "the input element 14 can be text field or a command line prompt in which the user enters a message 16 having an address 18 for whom he message 16 is intended. . .". It is submitted that messages in Appelman are not directed from a first client to a second unidentified client as claimed, but that all of the messages in Appelman are as clearly shown in Fig. 15 as address 634 and Fig. having address fields 644 and 652 (see Col. 9, lines 32 and 46-47). Much of Appelman discloses completing partial addresses that are entered in the input element of a user interface using a subset of potential message recipients (see Col. 6, line 8-Col. 8, line 40).

Robertson discloses a method for moderating forums with anonymous but traceable contributions to the forum. An administrator is a person who sets up and maintains forums (see Col. 1, lines 13-14). A moderator is a subject-matter expert appointed to monitor the messages being posted to a particular (see Col. 1, lines 23-24). In Robertson, the identity of the forum

contributor is hidden from readers of the anonymous contributor's messages, but at the same time, is known to the moderator(see Col. 2, lines 40-42). "A method for anonymously posting a message to a moderated forum, which can be moderated despite the anonymous contribution, is illustrated in FIG. 1" (see Col. 5, lines 24-26).

In claims 1, 6 and 10, methods for electronic instant message conversation are claimed in which a second unidentified client receives a first message to be published from a first client, the first message including a question related to a topic of interest. As claimed, the second subscriber being a subscriber to the service of the pub/sub service as being willing to receive questions related to the topic of interest and being anonymous to the first client and other subscribers of the pub/sub service. Thus in claim one, subscribers to the service themselves establish the messages to be received, and not an administrator as in Robertson, or the first user as in Appelman. Further, as claimed, the subscribers, by registering, indicate a willingness to answer questions related to the topic of interest. This is not shown in Appelman or Robertson. Claims 1, 6 and 10 also claim "creating at the second message . . . including an answer to the question contained in said first message;". Questions and answers are shown in Appelman, but those asking questions are always known to the answerer, and the answerer is always known to the questioner. In Robertson, a topic may be discussed which might include questions and answers, but the forum is established by an administrator, and not by subscribers who establish the topic and indicate a willingness to answer questions related to the topic, as claimed. It is submitted that claim 1, 6 and 10, and all claims depended therefrom, are allowable under 35 U.S.C. 103(a) over Appelman in view of Robertson, which allowance is respectfully requested.

In paragraph 4, claims 2-3, 5-9 claims 30 and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Appelman in view of Robertson and further in view of US 6,209,100 to Kapil et al. (hereinafter Kapil). The examiner cites Kapil for teaching the first message is received at the second client from the first client by way of a publish/subscribe server. However in Kapil, the second client is known to the first client (see Col. 4, lines 17-19): "In this arrangement, user A on the terminal 12 may request a messaging or communications session with user B in the second community 16 . . .". (see also, Col. 4, lines 6-9). In Kapil, a communication session is established between a user A and user B before messages are sent (see Col. 4, line 34-49). As claimed, the first user publishes a message containing a question related

to a topic of interest through a pub/sub service to unknown subscribers to are willing to answer questions related to the subject of interest. The unknown subscribers send a second message to the first user wherein the second message contains an answer to the question in the first message. It is submitted that claims 2-3, 5-9, 30 and 32 are allowable under 35 U.S.C. over Appelman in view of Robertson and further in view of Kapil, which allowance is respectfully requested.

It is respectfully submitted that the application is now in condition for allowance, which allowance is respectfully requested.

RESPECTFULLY SUBMITTED

/Floyd A. Gonzalez/

FLOYD A. GONZALEZ-Attorney

Registration No. 26,732

Phone: 845-433-7282

Fax: 845-432-9786